

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

KAREN S. ROWLAND, on behalf of)
herself and others similarly situated,)

Plaintiffs,)

v.)

TRANSWORLD SYSTEMS, INC.,)

MRS BPO, L.L.C.,)

CONVERGENT OUTSOURCING, INC.,)

NATIONAL COLLEGIATE STUDENT)
LOAN TRUST 2006-4)

NATIONAL COLLEGIATE STUDENT)
LOAN TRUST 2007-4, and)

U.S. BANK NATIONAL ASSOCIATION,)

Defendants.)

Civil Action No. 3:23-cv-258
Hon. M. Hannah Lauck
U.S. District Judge

**U.S. BANK NATIONAL ASSOCIATION’S
MOTION TO DISMISS PLAINTIFF’S AMENDED COMPLAINT**

Defendant U.S. Bank National Association (“U.S. Bank”), by counsel and pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully moves this Court to dismiss Plaintiff’s Amended Complaint [Dkt. No. 10] with prejudice. The reasons for this Motion are set forth in the memorandum of law contemporaneously filed herewith.

WHEREFORE, U.S. Bank respectfully requests that the Court enter an order: (1) granting U.S. Bank’s Motion to Dismiss; (2) dismissing Plaintiff’s claims with prejudice for failure to state a claim for relief under Fed. R. Civ. P. 12(b)(6); and (3) granting such further relief as the Court deems appropriate.

Dated: September 8, 2023

Respectfully submitted,

/s/ Brian C. Rabbitt

Brian C. Rabbitt
Virginia State Bar No. 77216
JONES DAY
51 Louisiana Avenue NW
Washington, DC 20001
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
brabbitt@jonesday.com

Albert J. Rota (*pro hac vice* pending)
JONES DAY
2727 North Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
ajrota@jonesday.com

Anthony M. Masero (*pro hac vice* pending)
JONES DAY
100 High Street, 21st Floor
Boston, MA
Telephone: (617) 960-3939
Facsimile: (617) 449-6999
amasero@jonesday.com

Counsel for U.S. Bank National Association

CERTIFICATE OF SERVICE

I certify that on September 8, 2023, I filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system, which will send notification electronically to all counsel of record.

/s/ Brian C. Rabbitt

Brian C. Rabbitt
Virginia State Bar No. 77216
JONES DAY
51 Louisiana Avenue NW
Washington, DC 20001
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
brabbitt@jonesday.com